

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et  
al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF WITHDRAWAL OF OBJECTION TO PROOF OF CLAIM NO. 505 FROM  
THE FOUR HUNDRED FORTY-SEVENTH OMNIBUS OBJECTION (NON-  
SUBSTANTIVE) OF THE PUERTO RICO ELECTRIC POWER AUTHORITY TO  
DEFICIENT CLAIMS [ECF NO. 20503]**

To the Honorable United States District Judge Laura Taylor Swain:

1. On April 1, 2022, the Puerto Rico Electric Power Authority ( “PREPA”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> filed the *Four Hundred*

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

*Forty-Seventh Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Deficient Claims* [ECF No. 20503] (the “Four Hundred Forty-Seventh Omnibus Objection”).

2. In light of additional information received since the filing of the Four Hundred Forty-Seventh Omnibus Objection, PRPEA respectfully withdraws, without prejudice, the Four Hundred Forty-Seventh Omnibus Objection, solely with respect to Proof of Claim No. 505 (the “Subject Claim”).

3. PREPA reserves the right to object to the Subject Claim on any other grounds whatsoever.

[*Remainder of Page Intentional Left Blank*]

Dated: August 1, 2022  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

Hermann D. Bauer  
USDC No. 215205  
Carla García Benítez  
USDC No. 203708  
Gabriel A. Miranda-Rivera  
USDC No. 306704  
**O'NEILL & BORGES LLC**  
250 Muñoz Rivera Ave., Suite 800  
San Juan, PR 00918-1813  
Tel: (787) 764-8181  
Fax: (787) 753-8944

*Attorneys for the Financial Oversight and Management Board for Puerto Rico, as representative for the Puerto Rico Electric Power Authority*

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)  
Ehud Barak (*pro hac vice*)  
Paul V. Possinger (*pro hac vice*)  
**PROSKAUER ROSE LLP**  
Eleven Times Square  
New York, NY 10036  
Tel: (212) 969-3000  
Fax: (212) 969-2900

*Co-Attorneys for the Financial Oversight and Management Board for Puerto Rico, as representative for the Puerto Rico Electric Power Authority*